

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**VOTER REFERENCE FOUNDATION,
LLC**

Plaintiffs,

V.

RAUL TORREZ, in his official
capacity as New Mexico Attorney General, and
MAGGIE TOULOUSE OLIVER, in her
Official capacity as New Mexico
Secretary of State,

Defendants.

CASE NO: 1:22-cv-00222-JB-KK

**NOTICE OF DEPOSITION OF
DEFENDANT TOULOUSE OLIVER
UNDER FED. R. CIV. P. 30(B)(6)**

PLEASE TAKE NOTICE that the deposition of Defendant Maggie Toulouse Oliver, pursuant to Fed. R. Civ. P. 30(b)(6) and through one or more officers, directors, or other representatives who shall be designated to testify on Defendant Toulouse Oliver's behalf regarding all information known or reasonably available to his office with respect to the subject matters identified in Attachment A, will be taken by Graves Garrett LLC, counsel for Plaintiff, at the offices of Harrison, Hart & Davis, LLC, 924 Park Avenue SW, Suite E, Albuquerque, NM, commencing at 9:00 a.m. on February 28, 2023, and continuing until completed, before a person authorized by law to administer oaths and recorded by stenographic means.

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Counsel for Plaintiff VRF

CERTIFICATE OF SERVICE

I, Edward D. Greim, certify that on January 25, 2023, this Notice of Deposition was served via e-mail as follows:

Erin Lecocq
Jeff Herrera
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/s/ Edward D. Greim
Edward D. Greim
Counsel for Plaintiff

EXHIBIT A

1. Any contacts with the Attorney General or with any person outside the office of the Secretary of State with respect to the criminal investigation of VRF, including but not limited to contacts with the FBI and other Attorneys General, Secretaries of State, or state officials.
2. The basis for the assertion that VRF, or anyone acting in concert with it, violated New Mexico law or may have violated New Mexico law.
3. Statements to the media by the Secretary or her agents regarding VRF, requests for and uses of voter data, or this lawsuit.
4. The Secretary's production of voter data to outside aggregators of voter information, including but not limited to ERIC, PILF, Catalist, Aristotle, i360, and any knowledge or investigation of the extent to which those entities share voter data with third parties who have not executed an authorization form with the Secretary.
5. Whether the Secretary agrees that an entity's sharing of data with an outside entity or person, "alone," does not violate New Mexico law.
6. Whether the Secretary agrees that an entity's publication or posting of New Mexico voter data on a website, may not, in some circumstances, violate New Mexico law.
7. The Secretary's maintenance of voter data, and the production of that data in response to requests.
8. The decision of the Secretary of State to refuse VRF's requests for voter data from 2022 to the present.
9. The basis for the Secretary's assertion that her actions as alleged in the First Amended Verified Complaint were not taken under the color or pretense of New Mexico law.
10. Any facts showing that New Mexico has a valid, substantial, or compelling interest in prohibiting and potentially in criminalizing VRF's conduct, and any facts showing that New Mexico's prohibition is sufficiently tailored to vindicate that interest.
11. The Secretary's admissions and denials in her Answer.
12. The Secretary's responses to discovery.